



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

VIA ELECTRONIC MAIL
RETURN RECEIPT REQUESTED

Mr. Greg Lalicker
Hilcorp Energy Company
1111 Travis Street
Houston, TX 77002
cjohnson@hilcorp.com

Re: Notice of Violation and Opportunity to Confer under the Clean Air Act
Hilcorp Energy Company's Mahoning – Buckner Facility in Pennsylvania

Dear Mr. Lalicker:

The U.S. Environmental Protection Agency (EPA) is issuing the enclosed Notice of Violation and Opportunity to Confer (NOVOC) to Hilcorp Energy Company (Hilcorp). The EPA is issuing this NOVOC under section 113(a) of the Clean Air Act (the Act or CAA), 42 U.S.C. § 7413(a). Based on information currently available and described in detail below, the EPA finds that Hilcorp is in violation of the provisions of the Pennsylvania State Implementation Plan, including Pennsylvania permitting requirements, at Hilcorp's Mahoning – Buckner's oil and natural gas production facility located in the Lawrence County, Pennsylvania. Section 113(a) of the Act provides the EPA several enforcement options to resolve these violations.

By this letter, the EPA is extending to you an opportunity to advise the EPA, via a conference call, or in writing, of any further information the EPA should consider with respect to the alleged violations. The EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this NOVOC.

The EPA contact in this matter is Erin Grisby, Attorney-Advisor, and she may be reached at (202) 564-3701 or grisby.erin@epa.gov within ten (10) days following receipt of this NOVOC if Hilcorp would like to schedule such a conference.

Sincerely,

Karen Melvin, Director
Enforcement & Compliance Assurance Division

Enclosure: Notice of Violation and Opportunity to Confer

Re: *Notice of Violation and Opportunity to Confer under the Clean Air Act*
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cc: Cory Johnson, Environmental Manager, Hilcorp (cjohnson@hilcorp.com)
Matt Henderson, Environmental Manager, Hilcorp (mhenderson@hilcorp.com)
Susan Foster, PADEP (sufoster@pa.gov)
Lori McNabb, PADEP (lmcnabb@pa.gov)
A.J. D'Angelo, EPA Region 3 (Dangelo.aj@epa.gov)
Bruce Augustine, EPA Region 3 (augustine.bruce@epa.gov)
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

**HILCORP ENERGY
COMPANY**

1111 Travis Street
Houston, TX 77002

NOTICE OF VIOLATION AND OPPORTUNITY TO CONFER

Docket No. CAA-003-21-005

Proceeding Pursuant to
the Clean Air Act,
42 U.S.C. §§ 7401-7671q

NOTICE OF VIOLATION

This Notice of Violation and Opportunity to Confer (NOVOC) serves as the finding and notice required under Section 113(a) of the Clean Air Act (CAA or the “Act”). The EPA alleges that Hilcorp Energy Company (Hilcorp) violated the Pennsylvania State Implementation Plan (PA SIP), including Pennsylvania permitting requirements, at its Mahoning Buckner oil and natural gas production facility identified in this NOVOC and that is located in Lawrence County, Pennsylvania.

I. STATUTORY AND REGULATORY BACKGROUND

1. The purpose of the Clean Air Act is to protect and enhance the quality of the nation's air resources so as to promote the public health and welfare and the productive capacity of its population. 42 U.S.C. § 7401(b)(1).

National Ambient Air Quality Standards

2. Section 108(a) of the Act, 42 U.S.C. § 7408(a), requires the Administrator of the EPA to identify and prepare air quality criteria for each air pollutant, emissions of which may endanger public health or welfare, and the presence of which results from numerous or diverse mobile or stationary sources.
3. These pollutants are known as “criteria pollutants.” 42 U.S.C. § 7408.
4. For each such “criteria” pollutant, Section 109 of the Act requires the EPA to promulgate national ambient air quality standards (NAAQS) requisite to protect the public health and welfare. 42 U.S.C. § 7409.
5. Pursuant to Sections 108 and 109 of the Act, 42 U.S.C. §§ 7408, 7409, the EPA has identified sulfur dioxide (SO₂), oxides of nitrogen (NO_x), and ground-level ozone, among others, as criteria pollutants and has promulgated NAAQS for these pollutants.
6. Certain precursors to ozone formation, such as volatile organic compounds (VOC) and NO_x, are regulated as part of the air quality standards for ozone itself. 40 C.F.R. §§ 50.6 to 50.11. Ozone is not emitted directly from sources of air pollution. Ozone is a photochemical oxidant formed

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when VOC and NO_x react in the presence of sunlight. NO_x and VOC are called “ozone precursors.” Sources that emit ozone precursors are regulated to reduce ground-level ozone. 62 Fed. Reg. 38,856 (July 18, 1997).

7. Section 107(d) of the Act, 42 U.S.C. § 7407(d), requires that each state designate those areas within its boundaries where the air quality either meets or does not meet the NAAQS for each criteria pollutant, or where the air quality cannot be classified due to insufficient data.
8. An area that meets the NAAQS for a particular criteria pollutant is termed an “attainment” area with respect to such pollutant.
9. An area that does not meet the NAAQS for a particular criteria pollutant is termed a “nonattainment” area with respect to such pollutant.
10. Section 110(a) of the Act, 42 U.S.C. § 7410(a), requires each state to adopt and submit to the Administrator of the EPA a plan which provides for implementation, maintenance, and enforcement, for each promulgated NAAQS, in each air quality control region (or portion thereof), known as a State Implementation Plan (SIP).
11. Each SIP must include enforceable emission limitations and other control measures, and regulation of the modification and construction of any stationary source within the areas covered by the plan as necessary to assure that NAAQSs are maintained. Section 110(a)(2)(A) of the Act, 42 U.S.C. § 7410(a)(2)(A).
12. The SIP must also provide for establishment and operation of appropriate devices, methods, systems, and procedures necessary to monitor, compile and analyze data on ambient air quality and upon request make such data available to the EPA. Section 110(a)(2)(B) of the Act, 42 U.S.C. § 7410(a)(2)(B).
13. Upon the EPA’s approval, SIP requirements are federally enforceable under Section 113 of the CAA. 42 U.S.C. § 7413(a) and (b).
14. Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), provides that whenever, on the basis of any information available to the Administrator, the Administrator finds that any person has violated, or is in violation of, any requirement of prohibition of an applicable SIP, the Administrator may issue an order requiring such person comply with the requirements or prohibition of such plan, issue an administrative penalty order in accordance with Section 113(d) of the Act, 42 U.S.C. § 7413(d), or bring a civil action in accordance with Section 113(b) of the Act, 42 U.S.C. § 7413(d), for injunctive relief or civil penalties.

Pennsylvania State Implementation Plan (SIP)

15. Pursuant to sections 4(1) and 5 of the Air Pollution Control Act (APCA), 35 P.S. §§ 4004-4005, and Section 110 of the CAA, 42 U.S.C. § 7410, the Commonwealth of Pennsylvania adopted regulations that comprise the State Implementation Plan for Pennsylvania. The PA SIP regulations as approved by the EPA are set forth in 40 C.F.R. § 52.2020(c).

16. The facility identified in this NOVOC is located in Lawrence County, Pennsylvania. At all times relevant to this NOVOC, Pennsylvania has been located within the Ozone Transport Region (OTR), *see* 42 U.S.C. § 7511c(a). Any stationary source that emits or has the potential to emit at least 50 tons per year (tpy) of VOC is considered a “major stationary source” and is subject to the requirements for major sources as if the source was in a moderate ozone nonattainment area. *See* 42 U.S.C. § 7511c(b)(2). The CAA requirements for moderate ozone nonattainment areas are at Section 182(b), 42 U.S.C. § 7511a(b) and include, among other things, a requirement that the SIP have permitting requirements, *see* 42 U.S.C. § 7502(c)(5) (nonattainment new or modified major source permits), and emissions offset requirements, *see* 42 U.S.C. § 7503(c) (emission offsets for new or modified major source permits). Both NO_x and VOC are precursors of ozone and are therefore regulated to reduce ozone. *See* 42 U.S.C. § 7511a(f).
17. The PA SIP regulations governing construction, modification and reactivation plan approval requirements and operations permitting for stationary sources are currently codified at 25 Pa. Code § 127. Chapter 127 was included in the PA SIP approved by the EPA on July 30, 1996. 61 Fed. Reg. 39,597 (July 30, 1996), *as amended*.
18. Section 3 of the APCA sets forth the following definitions for purposes of the requirements thereunder:
 - a. “Air contaminant” means “smoke, dust, fume, gas, odor, mist, radioactive substance, vapor, pollen or any combination thereof.
 - b. “Air contamination” means “the presence in the outdoor atmosphere of an air contaminant which contributes to any condition of air pollution.”
 - c. “Air contamination source” means “any place, facility or equipment, stationary or mobile, at, from or by reason of which there is emitted into the outdoor atmosphere any air contaminant.”
 - d. “Air cleaning device” means “an article, chemical, machine, equipment or other contrivance, the use of which may eliminate, reduce or control the emission of air contaminants into the atmosphere.”
 - e. “Department” means “The Department of Environmental Resources of the Commonwealth.” The Department of Environmental Resources was abolished, and its functions were transferred to the Department of Conservation and Natural Resources and the Department of Environmental Protection in 1995.
 - f. “Stationary air contamination source” means “[a]ny air contamination source other than that which, when operated, moves in a given direction under its own power.”
 - g. “Person” means “any individual, public or private corporation for profit or not for profit, association, partnership, firm, trust, estate, department, board, bureau or agency of the Commonwealth or the Federal Government, political subdivision, municipality, district, authority or any other legal entity whatsoever which is recognized by law as the subject of rights and duties.”
 - h. “Plan approval” means “the written approval from [PADEP] which authorizes a person to construct, assemble, install or modify any stationary air contamination source or install thereon any air pollution control equipment or device.”
19. 25 Pa. Code § 1.1, part of the PA SIP implementing regulations, sets forth the following definitions for purposes of the requirements thereunder:

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- a. “Department” means “The Department of Environmental Protection of this Commonwealth.”
20. 25 Pa. Code § 121.1, part of the PA SIP implementing regulations, sets forth the following definitions for purposes of requirements thereunder:
- a. “Air pollution” means “[t]he presence in the outdoor atmosphere of any form of contaminant, including, but not limited to, the discharging from stacks, chimneys, openings, buildings, structures, open fires, vehicles, processes or any other source of any smoke, soot, fly ash, dust, cinders, dirt, noxious or obnoxious acids, fumes, oxides, gases, vapors, odors, toxic, hazardous or radioactive substances, waste or other matter in a place, manner or concentration inimical or which may be inimical to public health, safety or welfare or which is or may be injurious to human, plant or animal life or to property or which unreasonably interferes with the comfortable enjoyment of life or property.”
 - b. “Construction” means “[t]o physically initiate assemblage, installation, erection or fabrication of an air contamination source or an air pollution control device, including building supports and foundations and other support functions.”
 - c. “Facility” means “[a]n air contamination source or a combination of air contamination sources located on one or more contiguous or adjacent properties and which is owned or operated by the same person under common control.”
 - d. “Modification” means “[a] physical change in a source or a change in the method of operation of a source which would increase the amount of an air contaminant emitted by the source or which would result in the emission of an air contaminant not previously emitted, except that routine maintenance, repair and replacement are not considered physical changes. An increase in the hours of operation is not considered a modification if the increase in the hours of operation has been authorized in a way that is Federally enforceable or legally and practicably enforceable by an operating permit condition.”
 - e. “Potential emission rate” means “[t]he total weight rate at which a particular air contaminant, in the absence of air cleaning devices, would be emitted per unit of time from an air contamination source when the source is operated at its rated capacity.”
 - f. “Potential to emit” means “[t]he maximum capacity of a source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and limitations on hours of operation or on the type or amount of material combusted, stored or processed shall be treated as part of the design if the limitation or the effect it would have on emissions is Federally enforceable or legally and practicably enforceable by an operating permit condition. The term does not include secondary emission from an offsite facility.”
 - g. “Source” means “[a]n air contamination source.”
21. 25 Pa. Code § 127.14(a)(8), part of the PA SIP implementing regulations, incorporates the following definitions from 58 PA.C.S. § 3203 for purposes of requirements thereunder:
- a. “Unconventional gas well” means “A bore hole drilled or being drilled for the purpose of or to be used for the production of natural gas from an unconventional formation.”
 - b. “Unconventional formation” means “a geological shale formation existing below the base of the Elk Sandstone or its geologic equivalent stratigraphic interval where natural gas generally cannot be produced at economic flow rates or in economic volumes except by

vertical or horizontal well bores stimulated by hydraulic fracture treatments or by using multilateral well bores or other techniques to expose more of the formation to the well bore.”

PADEP's Plan Approval and Operating Permit Requirements

22. A person may not cause or permit the construction or modification of an air contamination source, the reactivation of an air contamination source after the source has been out of operation or production for one (1) year or more, or the installation of an air cleaning device on an air contamination source unless the construction, modification, reactivation or installation has been approved by the Department of the Environmental Protection (hereinafter “PADEP”), except as provided in §§ 127.11a and 127.215 (relating to reactivation) of Title 25. 25 Pa. Code § 127.11; *see* 35 P.S. § 4006.1(a).
23. An application for plan approval must, among other things:
 - a. contain information that is requested by PADEP and is necessary to perform a thorough evaluation of the air contamination aspects of the source, 25 Pa. Code § 127.12(a)(2);
 - b. show that the source will be equipped with reasonable and adequate facilities to monitor and record the emissions of air contaminants and operating conditions which may affect the emissions of air contaminants and that the records are being and will continue to be maintained and that the records will be submitted to PADEP at specified intervals or upon request, 25 Pa. Code § 127.12(a)(3);
 - c. show that the source and the air cleaning devices are capable of being and will be operated and maintained in accordance with good air pollution control practices. 25 Pa. Code § 127.12(a)(10); and
 - d. show that the source will comply with applicable requirements of [subparagraphs a through c above, among other things,] article and requirements promulgated by the Administrator of the EPA under the Clean Air Act, 25 Pa. Code § 127.12(a)(4).
24. A person may not operate a stationary air contamination source unless PADEP has issued to the person a permit to operate the source under this article in response to a written application for a permit submitted on forms and containing the information the Department may prescribe. 25 Pa. Code §§ 127.402(a), 127.411 (on application contents), 127.443(a); *see* 25 Pa. Code § 127.402(a); 35 P.S. § 4006.1(b).

PADEP's Category 38 Exemption

25. Pursuant to Section 5(9) of the APCA, PADEP adopted 25 Pa. Code § 127.14(a)(8), exempting from plan approval requirements the construction, modification, reactivation or installation of certain sources and classes of sources determined to be of minor significance by PADEP.
26. Effective August 8, 2018, in accordance with 25 Pa. Code § 127.14(d), PADEP published an updated list of sources and classes of sources determined in accordance with section 127.14(a)(8) to be exempt from the plan approval requirements of 25 Pa. Code §§ 127.11, 127.12. Pa. Dept. of Env't Prot., *Air Quality Permit Exemptions*, 48 Pa. Bulletin 23, 3490 (June 9, 2018); PADEP Bureau of Air Quality, Doc. No. 275-2101-003 (Aug. 8, 2018) (“Exemptions List”). The list includes qualification criteria for each exemption category. Listed sources that demonstrate

compliance with the relevant exemption criteria may claim exemption from the PA SIP's plan approval requirements.

E38(b) Exemption Criteria for Unconventional Wells and Associated Equipment

27. Plan approval exemption 38(b) ("E38(b)") provides the exemption criteria for air contamination sources constructed, reconstructed or modified on or after August 10, 2013, but before August 8, 2018, and any existing oil and gas exploration, development, and production facilities and associated equipment and operations seeking authorization to operate without a plan approval under E38(b) criteria on or after August 10, 2013, but prior to August 8, 2018. Exemptions List at 6.
28. E38(b)(d) specifically exempts "[u]nconventional wells, wellheads, and associated equipment, provided the applicable exemption criteria specified in subparagraphs i, ii, iii, iv and v are met." Exemption List at 6 (see E38(b)(d)).
29. As E38(b) qualification criteria, subparagraph iv provides, among other things, that "[e]nclosed combustion device including enclosed flare will be used for all permanent flaring operations at a wellhead or facility." Exemption List at 8 (see E38(b)(d)(iv)(D)).
30. E38(b) specifies that the owner or operator will demonstrate compliance with the exemption criteria to PADEP using any generally accepted model or calculation methodology within 180 days after the well completion or installation of a source. Exemptions List at 8.

II. FACTUAL BACKGROUND AND INSPECTION FINDINGS

31. Hilcorp is a Texas corporation that owns and operates the Mahoning – Buckner natural gas production facility listed in TABLE 1, below, which is located in Lawrence County, Pennsylvania (the Mahoning – Buckner" or the "Facility").

Exemption Status

32. On or around March 16, 2017, Hilcorp submitted documentation to PADEP in order to demonstrate the Facility's compliance with E38(b) qualification criteria (hereinafter "E38 documentation").
33. In its E38 documentation, Hilcorp represented that the Mahoning – Buckner Facility or its storage tanks were constructed on January 30, 2015.
34. In its E38 documentation, Hilcorp represented the number of produced water storage tanks at the Mahoning – Buckner Facility and provided its calculation of the uncontrolled VOC emissions, tons per year (tpy) and pounds per hour (lbs/hr) of emissions for the produced water storage tanks (PWTs) as summarized in TABLE 1, below.
35. In its E38 documentation, Hilcorp represented that all VOC emissions from the storage tanks at the Mahoning – Buckner Facility were captured and routed through a shared header line to a flare. Hilcorp also therein calculated the controlled VOC emissions from these storage tanks based upon 100% capture of the uncontrolled emissions and the routing of the captured

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emissions to a flare with a destruction and removal efficiency (DRE) of greater than or equal to 98%.

36. In its E38 documentation, Hilcorp represented that the flare used to control VOC emissions from the storage tanks at the Facility to be a Zeeco MJAG-4D-38-X, a candlestick flare.

TABLE 1: LOCATION, STORAGE VESSEL, AND FLARE INFORMATION

Facility Name	Physical Location (latitude, longitude)	County	# of PWTs	Uncontrolled PWT Emissions (tpy VOC per tank)	Flare Efficiency
Mahoning – Buckner	41.02944, - 80.44704	Lawrence	2	2.9	98%

Inspection Findings

37. On October 17, 2018 and October 18, 2018, two EPA inspectors (individually and collectively, the “Inspectors”), accompanied by PADEP inspector Marilyn Blystone on October 17 and 18, 2018 and PADEP inspector Kyle Lewarchik on October 18, 2018, conducted an on-site PA SIP and CAA compliance evaluation inspection in order to assess Hilcorp’s compliance with applicable state and federal regulations at the Facility (the “Inspection”).
38. At the time of the Inspection, Hilcorp owned, and was engaged in oil and natural gas production at, the Facility.
39. At the time of the Inspection and at all relevant times herein, the Facility contained sources that emitted or emit air contaminants, including smoke, fumes, gas, odors, mists, vapor and combinations thereof, into the outdoor atmosphere; therefore, the Facility is an “air contamination source” as that term is defined by the APCA, which is subject to the requirements of the PA SIP.
40. The Inspectors observed that: the Facility receives process water, condensate, and natural gas from surrounding well pads; the natural gas is pressurized and sent offsite via a sales line, while the condensate and process water are separated out and stored onsite in above ground produced oil (or “condensate”), slop and produced water storage tanks; and the storage tanks are each kept at or near atmospheric pressure.
41. When pressurized oil is transferred to storage tanks at the Facility that are kept at atmospheric pressure, some of the hydrocarbons in the oil, including VOCs and hazardous air pollutants, vaporize in what is referred to as “flashing.” After flashing occurs, the oil continues to emit vapors due to liquid level changes and temperature fluctuations.
42. Vapors that are emitted from Facility storage tanks as a result of flashing, liquid level changes and temperature fluctuations are captured and controlled through a series of pipes or vent lines that route these vapors to a combustion device at the Facility. For purposes of this NOV, the term “vapor control system” refers to the vent lines that run from a Facility storage tank or group of connected storage tanks to a combustion device at that Facility and all connections, fittings,

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pressure relief devices (including thief hatches) and any other appurtenance used to contain and collect storage tank vapors or to transport or convey the vapors to a control device.

43. During the Inspection, Inspectors observed that the Facility operated a vapor control system that was configured so that the vapors from the storage vessels that were collected in the tank headspace should route through a shared, interconnected closed vent system to a combustion control device.
44. At the time of the Inspection and at all relevant times herein, Hilcorp's Mahoning – Buckner Facility utilized a model MJAG-4D-38-X candlestick flare manufactured by Zeeco to control the emission of air contaminants into the atmosphere; therefore, the Zeeco MJAG-4D-38-X is an "air cleaning device" as that term is defined by the APCA, which is subject to the requirements of the PA SIP.

45.

Emissions Determination

46. Based upon the Inspection findings, Hilcorp's Mahoning – Buckner Facility does not meet the E38(b)(d)(iv)(D) qualification criterion of using an enclosed combustion device for all permanent flaring operations at a wellhead or facility, and, therefore, is not exempt from the plan approval requirements of the PA SIP under E38(b) because the Facility utilizes a candlestick flare for its flaring associated with the storage vessels at the Facility.

III. FINDINGS OF VIOLATION

COUNT: Violation of 25 Pa. Code §§ 127.11, 127.402, and 127.443 for Failure to Obtain Plan Approval and an Operating Permit in Accordance with the PA SIP

47. As discussed in the Inspection and Inspection Findings section above, the storage vessels and combustion device at Hilcorp's Mahoning – Buckner Facility are air contamination sources and an air cleaning device, respectively, and, therefore, are subject to the PA SIP's plan approval and permitting requirements.
48. The PA SIP's plan approval requirement mandates that a person may not cause or permit the construction or modification of an air contamination source, the reactivation of an air contamination source after the source has been out of operation or production for one (1) year or more, or the installation of an air cleaning device on an air contamination source unless the construction, modification, reactivation or installation has been approved by PADEP except as provided in §§ 127.11a and 127.215 (relating to reactivation) of Title 25. 25 Pa. Code § 127.11.
49. The PA SIP requires that a person may not cause or permit the operation of a source the construction, modification or reactivation of which, or the installation of an air cleaning device on which, is subject to § 127.11 (relating to plan approval requirements), unless PADEP has issued a permit to operate the source. 25 Pa. Code §§ 127.402, 127.443(a).
50. Section 127.14(a)(8) exempts from plan approval requirements of 25 Pa. Code §§ 127.11 the construction, modification, reactivation or installation of certain sources and classes of sources determined to be of minor significance PADEP, to include E38(b). 25 Pa. Code 127.14(a)(8).

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51. In order to qualify for E38(b), unconventional wells, wellheads, and associated equipment, must satisfy applicable exemption criteria, including the criterion that the owner or operator use enclosed combustion devices for all permanent flaring operations at the facility. *See* E38(b)(d)(iv)(D), Exemption List at 6-8.
52. As discussed in the Inspection Findings and Exemption Determination sections, Paragraphs 37 through 45, above, Hilcorp's Mahoning – Buckner Facility does not qualify for exemption from the PA SIP's plan approval and permitting requirements under E38(b) because Hilcorp does not use an enclosed combustion device to control emissions from the storage tanks at the Facility, and, therefore, Hilcorp is operating its Mahoning – Buckner Facility without a plan approval or permit authorization in violation of 25 Pa. Code §§ 127.11, 127.402 and 127.443.

IV. ENFORCEMENT PROVISIONS

53. Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), provides that whenever, on the basis of any information available to the Administrator, the Administrator finds that any person has violated, or is in violation of, any requirement of prohibition of an applicable SIP, the Administrator has several enforcement options to resolve these violations.
54. Pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b), as amended by the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 and the Debt Collection Improvement Act, 31 U.S.C. § 3701 and 40 C.F.R. § 19.4, EPA may seek penalties of up to \$102,638 per day for violations of the CAA that occurred after November 2, 2015 and are assessed on or after December 23, 2020.
55. The issuance of this NOVOC does not in any way limit or preclude the EPA from pursuing additional enforcement options concerning inspections or review referenced in this NOVOC. This NOVOC does not preclude enforcement action for violations not specifically addressed in this NOVOC.
56. The EPA is extending to Hilcorp an opportunity to advise the EPA, via a conference call, or in writing, of any further information the EPA should consider with respect to the alleged violations. Please reply, or if you have obtained an attorney have the attorney reply, within ten (10) calendar days following receipt of this letter to Erin Grisby, Attorney-Advisor, at (202) 564-3701 or grisby.erin@epa.gov as to whether Hilcorp would like to schedule such a conference.

Date

Karen Melvin, Director
Enforcement & Compliance Assurance Division